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VIA ECF

Honorable Taryn A. Merkl United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11202

> Re: Molina et al v. Xia et al. 1:22-cv-00864 (DG) (TAM)

Dear Judge Merkl:

As counsels for the plaintiffs in this matter, we respectfully submit this letter jointly, with Defendants' counsel, pursuant to the Court's text order dated June 10, 2022.

Notices of Appearance for Defendants

On June 9 and June 13, 2022, Defendants' counsel Paul F. Millus, Esq. Daniel B. Rinaldi, and Randall T. Eng, of Meyer, Suozzi, English & Klein, P.C., filed Notices of Appearance for Defendants Richard Xia, a/k/a Yi Xia, Fleet Financial Group, Inc., X & Y Development Group, LLC, and Perini Group, Inc. See Doc. Nos. 18-20.

Following the filed Notices of Appearance, the parties conferenced, and Defendants' counsel agreed to sign Waivers of the Service of Summons.

Waiver of Service of the Summons

On June 23, 2022, Defendants' counsel signed Waivers of the Service of Summons for Defendants Richard Xia, a/k/a Yi Xia, Fleet Financial Group, Inc., X & Y Development Group, but not Perini Group, Inc. See Doc. Nos. 21-23.

Defendants' deadline to file an Answer to Plaintiff's Amended Complaint

Pursuant to Fed. R. Civ. P. 4 (d)(3), Defendants' deadline to file an Answer to Plaintiffs' Amended Complaint is August 22, 2022.

Respectfully submitted,

/s/ Brian Nettle

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/s/ Naoki Fujita

TakeRoot Justice 123 William St., Flr 16 New York, NY 10038

MEYER SUOZZI ENGLISH & KLEIN P.C.

s/Paul F. Millus

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